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Attorneys for Plaintiffs and Opt-In Plaintiffs

[Additional Counsel of Record listed on the Signature page]

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

KELLY CAHILL, et al., individually and
on behalf of others similarly situated,
Plaintiffs,

vs.

NIKE, INC., an Oregon Corporation,
Defendant.

Case No. 3:18-cv-01477-JR

**DECLARATION OF INDIA LIN
BODIEN IN SUPPORT OF PLAINTIFFS'
MOTION FOR CLASS
CERTIFICATION**

1. I am an attorney licensed to practice in the state of Washington. I am in good standing with the Bar of the State of Washington.¹ I am a solo practitioner who, along with Goldstein, Borgen, Dardarian & Ho (“GBDH”), Ackermann & Tlajef, P.C. (“A&T”), and Markowitz Herbold, PC (“MH”), are counsel for the named Plaintiffs Kelly Cahill, Sara Johnston, Lindsay Elizabeth, and Heather Hender (“Plaintiffs”) and the proposed Class (“Class” or “Class Members”) in the above captioned action (“Action”). I have been admitted *Pro Hac Vice* to this Court in this Action. I have personal knowledge of the facts set forth in this declaration and could and would testify competently to them.

2. I make this declaration in support of Plaintiffs’ Motion for Class Certification.

3. I have no knowledge of any conflict of interest between me and my firm and the Plaintiffs, on the one hand, and any Class Member, on the other hand.

ATTORNEY EXPERIENCE & ADEQUACY OF REPRESENTATION

4. GBDAH, A&T, MH, and my firm are adequate to serve as Class Counsel for the proposed class in this Action, and to represent the interests of the Class.

5. In 2005, I received a B.A. from the University of Washington in Seattle, Washington. In 2012, I received a J.D. from the University of Akron School of Law with a Certificate in Intellectual Property Law in Sports, Media, and Entertainment. I also earned honors in Entertainment Law, International Human Rights, and Copyright Law. I became a member of the Bar of the State of Washington in June 2012. From June, 2012, to approximately August, 2013, I served as “of counsel” for a boutique litigation firm in Seattle, Washington, where I litigated a variety of matters.

6. Since becoming a solo practitioner in 2013, I have devoted a substantial percentage of my practice to representing employees in class action cases. I have served as co-

¹ I am also admitted to the U.S. District Courts for the Eastern and Western Districts of Washington, and for the District of Colorado.

counsel on numerous recent class action cases in Washington and other states. I have been appointed adequate class counsel in numerous recent class action cases, including, but not limited to:

- ***McMakin v. Dominos***, Order and Final Judgment Granting Final Approval of Class Action Settlement and Attorney's Fees and Costs, Case No. 16-2-20655-7, King County Super. Ct. (June 2, 2017) (Judge Richard McDermott);
- ***Eilerman, et al. v. McLane Co., Inc. DBA McLane/Northwest***, Order and Final Judgment Granting Final Approval of Class Action Settlement and Attorney's Fees and Costs, Case No. 3:16-cv-05303, U.S. Dist. Ct., W.D. Wash. (May 17, 2017) (Judge Benjamin H. Settle);
- ***Asplund v. White Timber Indus., Inc.***, Order and Final Judgment Granting Final Approval of Class Action Settlement and Attorney's Fees and Costs, Case No. 16-2-00870-5, Wash. Super. Ct., Cowlitz County. (Sept. 13, 2017) (Judge Gary Bashor);
- ***Harris, et al. v. Jerry Debraie Logging Co., Inc.***, Order and Final Judgment Granting Final Approval of Class Action Settlement and Attorney's Fees and Costs, Case No. 16-2-00402-5, Wash. Super. Ct., Cowlitz County (June 7, 2017) (Judge Stephen M. Warning);
- ***Ramirez v. Valley Roz Orchards, LP***, Order and Final Judgment Granting Final Approval of Class Action Settlement and Attorney's Fees and Costs, Case No. 17-2-00221-39, Wash. Super. Ct., Yakima County (Nov. 17, 2017) (Judge Michael McCarthy);
- ***Perez-Hernandez v. Oasis Farms, Inc.***, Order and Final Judgment Granting Final Approval of Class Action Settlement and Attorneys' Fees and Costs, Case No. 17-2-00749-5, Wash. Super. Ct., Yakima County (Jan. 12, 2018) (Judge Sam Swanberg);
- ***Chipres v. M&L Contractor, LLC***, Order and Final Judgment Granting Final Approval of Class Action Settlement and Attorneys' Fees and Costs, Case No. 17-2-50197-11, Wash. Super. Ct. Franklin County (Jan. 29, 2018) (Judge Pamela Peterson);
- ***Flores Olivares v. Blue Mountain Farms, LLC***, Order and Final Judgment Granting Final Approval of Class Action Settlement and Attorneys' Fees and Costs, Case No. 17-2-00028-1, Wash. Super. Ct. Walla Walla County (Feb. 16, 2018) (Judge John W. Lohrmann);
- ***Garcia v. Carpenter Ranches, LLC***, Order and Final Judgement Granting Final Approval of Class Action Settlement and Attorneys' Fees and Costs, Case No. 17-2-00405-39, Wash. Super. Ct. Yakima County (Mar. 16, 2018) (Judge Richard H. Bartheld);
- ***Meyer v. Christensen, Inc. DBA Powell-Christensen, Inc.***, Order and Final Judgement Granting Final Approval of Class Action Settlement and Attorneys' Fees and Costs, Case No. 17-2-01582-39, Wash. Super. Ct. Yakima County (May 4, 2018) (Judge Michael G. McCarthy);
- ***Pagan-Serrano et al. v. Lanier Brugh Corporation***, Order and Final Judgement Granting Final Approval of Class Action Settlement and Attorneys' Fees and Costs, Case No. 17-2-08698-9, Wash. Super. Ct. Pierce County (June 15, 2018) (Judge Frank Cuthbertson);
- ***Santamour et al. v. UPS Ground Freight, Inc.***, Order and Final Judgement

Granting Final Approval of Class Action Settlement and Attorneys' Fees and Costs, Case No. 2:17-cv-00394, U.S. District Ct., E.D. Wash. (June 26, 2018) (Judge Thomas O. Rice);

- ***Michener v. M & M Transport, Inc.***, Order and Final Judgement Granting Final Approval of Class Action Settlement and Attorneys' Fees and Costs, Case No. 18-2-04689-6, Wash. Super. Ct. Pierce County (Sept. 21, 2018) (Judge Jack Nevin);
- ***Crowl v. Brown Line, LLC***, Order and Final Judgement Granting Final Approval of Class Action Settlement and Attorneys' Fees and Costs, Case No. 18-2-00089-29, Wash. Super. Ct. Skagit County (Oct. 19, 2018) (Judge Brian L. Stiles);
- ***Dotson v. Gresham Transfer, Inc.***, Order and Judgement Granting Final Approval of Class Action Settlement and Attorneys' Fees and Costs, Case No. 18-2-02190-1, Wash. Super. Ct. King County (January 4, 2019) (Judge John Erlick);
- ***Zepeda et al. v. Flamingo Trucking, Inc.***, Order and Judgement Granting Final Approval of Class Action Settlement and Attorneys' Fees and Costs, Case No. 17-2-00280-5, Wash. Super. Ct. Adams County (January 14, 2019) (Judge Steve Dixon);
- ***O'Shaughnessey v. DLM Trucking, LLC***, Order and Judgement Granting Final Approval of Class Action Settlement and Attorneys' Fees and Costs, Case No. 17-2-04512-39, Wash. Super. Ct. Yakima County (January 14, 2019) (Judge Blaine G. Gibson);
- ***Miranda v. Sorenson Transportation Co., Inc.***, Order and Judgement Granting Final Approval of Class Action Settlement and Attorneys' Fees and Costs, Case No. 18-2-00269-21, Wash. Super. Ct. Lewis County (February 1, 2019) (Judge James W. Lawler);
- ***Walker v. Wyndham Vacation Ownership, Inc.***, Order and Judgement Granting Final Approval of Class Action Settlement and Attorneys' Fees and Costs, Case No. 18-2-08501-2 SEA, Wash. Super. Ct. King County at Seattle (July 1, 2019) (Judge Melinda Young);
- ***Hedglin v. Swift Transportation Co. of Arizona, LLC***, Order and Judgement Granting Final Approval of Class Action Settlement and Attorneys' Fees and Costs, Case No. 3:16-cv-05127-BHS, U.S. District Ct., W.D. Wash. (July 8, 2019) (Judge Benjamin H. Settle);
- ***Layton v. Heartland Express, Inc. of Iowa and Gordon Trucking, Inc.***, Order and Judgement Granting Final Approval of Class Action Settlement and Attorneys' Fees and Costs, Case No. 17-2-00667-0 KNT, Wash. Super. Ct. King County at Kent (April 12, 2019) (Judge Michael Scott);
- ***Henderson v. JB Hunt Transport, Inc.***, Order and Judgement Granting Final Approval of Class Action Settlement and Attorneys' Fees and Costs, Case No. 17-2-14673-1 KNT, Wash. Super. Ct. King County at Kent (May 13, 2019) (Judge John McHale);
- ***Smith et al. v. T-W Transp., Inc. etc.***, Order and Judgment Granting Final Approval of Class Action Settlement and Attorney's Fees and Costs, Case No. 17-2-02864-3, Wash. Super. Ct. Spokane County (December 13, 2019) (Judge Tony Hazel);
- ***Bearchild v. XPO Logistics Freight, Inc.***, Order and Judgment Granting Final Approval of Class Action Settlement and Attorney's Fees and Costs, Case No. 18-2-16950-0 KNT, Wash. Super. Ct. King County at Kent (December 13, 2019) (Judge John P. Erlick);

- ***Crites v. Smokey Point Distributing, Inc.***, Order and Judgment Granting Final Approval of Class Action Settlement and Attorney’s Fees and Costs, Case No. 18-2-19921-2 SEA, Wash. Super. Ct. King County at Seattle (January 17, 2020) (Judge Brian McDonald); and
- ***Huntley v. Veneer Chip Transport, Co.***, Order and Judgment Granting Final Approval of Class Action Settlement and Attorney’s Fees and Costs, Case No. 19-2-06148-6, Wash. Super. Ct. Pierce County (May 8, 2020) (Judge Jerry Costello).
- ***Ceniceros v. Builder’s Insulation of Oregon, LLC***, Order and Final Judgment Granting Final Approval of Class Action Settlement and Attorneys’ Fees and Costs, Case No. 19-2-13068-7 KNT, Wash. Super. Ct. King County at Kent (May 15, 2020) (Judge Michael Scott);
- ***Crane et. al. v. Toyota Logistics Services, Inc.***, Order Granting Joint Motion for Final Approval of Class Action Settlement and Judgment, Case No. 19-2-20017-1 KNT, Wash. Super. Ct. King County at Kent (September 11, 2020) (Judge Nicole Gaines-Phelps);
- ***Fowlkes v. CHS, Inc.***, Order and Final Judgment Granting Final Approval of Class Action Settlement and Attorneys’ Fees and Costs, Case No. 19-2-01241-32, Wash. Super. Ct. Spokane County (September 18, 2020) (Judge Timothy Fennessy);
- ***Young v. Safelite Fulfillment, Inc.***, Order Granting Plaintiff’s Motion for Final Approval of Class Action Settlement, Case No. 2:19-CV-01027-JLR, U.S. Dist. Ct. W.D. Wash. (December 3, 2020) (Judge James L. Robart);
- ***Silvestre Reyes v. Mar-Jon Labor, LLC***, Order Entering Final Judgment and Granting Final Approval of Class Action Settlement and Attorneys’ Fees and Costs, Case No. 18-2-03815-39, Wash. Super. Ct. Yakima County (January 8, 2021) (Judge Blaine Gibson);
- ***Birnbaum et. al. v. Junk Consulting Services, LLC DBA 1-800-GOT-JUNK OF WASHINGTON***, Order and Final Judgment Granting Final Approval of Class Action Settlement and Attorneys’ Fees and Costs, Case No. 20-2-00351-4 KNT, Wash. Super. Ct. King County at Kent (February 1, 2021) (Judge Ketu Shah);
- ***Millican v. Seattle Tennis Club***, Order and Final Judgment Granting Final Approval of Class Action Settlement and Attorneys’ Fees and Costs, Case No. 20-2-05117-9 SEA, Wash. Super. Ct. King County at Seattle (May 14, 2021) (Judge Michael Scott);
- ***Adams v. Davenport Collection Payroll Co., LLC***, Order and Final Judgment Granting Final Approval of Class Action Settlement and Attorneys’ Fees and Costs, Case No. 20-2-01109-32, Wash. Super. Ct. Spokane County (June 4, 2021) (Judge Tony Hazel);
- ***Golightly v. AMDA, Inc.***, Order Granting Motion for Final Approval of Class Action Settlement, Case No. 20STCV13173, Cal. Super. Ct. Los Angeles County (December 1, 2021) (Judge Amy D. Houge) (*admitted pro hac vice*);
- ***Crane v. URS Midwest, Inc.***, Order Granting Motion for Attorneys’ Fees, Costs, and Incentive Award to Plaintiff, Case No. 2:19-CV-01407-JLR, US Dist. Ct. W.D. Wash. (November 2, 2021) (Judge James L. Robart).

7. My firm is currently putative class co-counsel in over a dozen putative class


action cases pending in Washington State courts and other courts.

8. In addition, since starting my firm in 2013, I have dedicated a large part of my practice to representing employees in sexual and racial harassment cases brought under Title VII and/or state antidiscrimination laws, and have served as co-counsel in over twenty individual or multi-plaintiff workplace harassment and/or discrimination cases.

9. As demonstrated above, I have extensive experience litigating complex class action cases, as well as individual and multi-plaintiff sexual harassment and discrimination cases brought under Title VII and state laws. I am well versed in the applicable law.

10. In the course of my firm's investigation and work on the case, I worked cooperatively and efficiently dividing work with GBDH, A&T, and MH in this case. GBDH has served as lead counsel, and work on the case has been allocated based on both availability and experience. The firms have collaborated productively and continue to do so.

I declare under penalty of perjury under the laws of the State of Washington, the State of Oregon, and of the United States that the foregoing is true and correct, and that this Declaration was executed this 4th day of January, 2022, in Tacoma, Washington.



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